

Underground Storage Tank (UST) Draft Regulations & Tips August 10, 2016



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EPA passed new UST regulations August 8, 2015

- Kansas must revise its regulations to maintain State-program approval
- Otherwise EPA regs take effect anyway

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Operator Training

- Kansas has required since 2007
- Level A/B must be certified every 4 years
- Level C (clerks and Facility employees) must be trained every year

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Secondary Containment

Kansas adopted this rule July 1, 2013

Owners and operators shall install secondary containment and interstitial monitoring

- When replacing tanks
- When more than 50% of piping line replaced

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Periodic walkthrough inspections

- Must use an approved inspection document
- O/O are required to maintain records of walkthrough inspections for one year

Implementation: Within three years after KDHE adopts rules

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Every 30 days

- Check spill prevention equipment for damage and remove liquid or debris
- Check for and remove obstructions in the fill pipe

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Every 30 days

- Check the fill cap to ensure it is securely on the fill pipe
- Double-walled spill buckets with interstitial monitoring: check for a leak in the interstitial area

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Every 30 days

- Check release detection equipment to ensure it is operating with no alarms or unusual operating conditions present
- Ensure release detection records are reviewed and current.

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Monthly UST Inspection																
Inspection Date		KS. Owner ID No.		U N L e a d												
Owner Name		Phone Number														
Owner Address																
City, State, Zip code		KS. Facility ID														
Site Name																
Site Address																
City, State, Zip code		A/B Number														
Site A/B Operator					0	0	1									
<small>Instructions: Mark each tank where no problem is observed with a checkmark "✓". If certain equipment is not required and/or not present, mark checklist in the "N/A" column. If a defect is found, mark the checklist with an "X". Describe the problem in the "DEFICIENCIES" section, and notify the appropriate person. If unable to get reports, or access to equipment mark with a "U", describe the issue in the "NOTE" section the information you need or why unable to inspect</small>																
Reviewed annual test and when they are due. Have contacted testing company to confirm that all test due will be completed				N/A	1	2	3	4	5	6	7	8				
Leak Detection	Description															
Interstitial Monitoring	Power is on															
Automatic Tank Gauge (ATG)	No warning or alarm lights blinking															
	There is a liquid measurement for each tank and the reading appears accurate															
	Printer has paper and is in working condition															
Electronic Leak Detection Monitor	Power is on															
	No warning or alarm lights blinking															
Mechanical Line Leak Detector	No customers have complained about slow flow															
<small>Automatic Tank Gauge (ATG), Statistical Inventory Reconciliation (SIR), Interstitial Monitoring (IM), Monitoring (VM), Inventory Control (IC), Annual Line Test (ALTT), Electronic Line Monitoring (ELM), Mechanical Line Leak Detector (MLLD), Safe Suction (SS)</small>					A	S	I	M	V	I	C	A	E	M	L	S
Record keeping	Leak Detection	TANK		A	T	G	R	M	C	T	M	D	S			
Put a Z in the box under the type of tank and/or line leak detection used																
Automatic Tank Gauge (ATG)	Passing tank test report printed and properly filed			N/A	1	2	3	4	5	6	7	8				
Statistical Inventory Reconciliation (SIR)	Annual KDHE ATG summary filled in to date															
	This month's inventory submitted															
	Last month's results passed and available for inspection															
Interstitial Monitoring	Annual KDHE SIR summary filled in to date if not done by vendor															
	Annual KDHE IM summary filled in to date															
Vapor Monitoring	Passing report properly filed															
	Difference between last month and this month is acceptable															
	Annual KDHE VM summary filled in to date															
Inventory Control (IC)	Inventory reconciled and within the regulatory standard															
	Annual KDHE IC summary filled in to date if not done by vendor															
Record keeping	Leak Detection	LINES		N/A	1	2	3	4	5	6	7	8				
Electronic Line Leak Detector (ELLD)	Passing tank test report printed and properly filed															
Water Check	Water checked monthly, logged and filed															
	Water check meets regulatory standards for product in tank															
	Facility has rectifier log and has an entry at least every 60 days															
Rectifier	Record volt and amp readings, readings consistent with previous reading															

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Annually

- Check containment sumps for damage and leaks to the containment area or releases into the environment
- Double-walled containment sumps with interstitial monitoring, check for a leak in the interstitial area

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Annually

- Check hand-held release detection equipment, such as gauge sticks and bailers, for operability and serviceability.

Implementation: Within three years after KDHE adopts rules

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Spill Containment

- Test equipment at least once every three years for liquid tightness or
- use a double-walled spill bucket with periodic (monthly) interstitial monitoring.

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Spill Containment

Test:

- Spill buckets
- Contained LLD sumps
- Dispenser sumps

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KDHE adopts rules***

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Overfill Prevention Equipment

- Must be inspected at least once every 3 years to ensure equipment is set to activate at the appropriate level in the tank when regulated substances reach that height.

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Overfill Prevention Equipment

- ATG (Outside Horn or Buzzer)
- Flapper valve
- Ball float (If it cannot be tested it must be replaced with another method)

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Release Detection Equipment

- Test annually to ensure release detection equipment is operating properly.
 - Automatic tank gauge
 - Mechanical line leak detector
 - Electronic line leak detector

***Implementation: Within three years after
KDHE adopts rules***

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Secondary Containment Testing

- Test containment sumps used for piping interstitial monitoring every three years for liquid tightness or
- use a double-walled containment sump with periodic interstitial monitoring.

Implementation: Within three years after KDHE adopts rules

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Interstitial Monitoring Results

- An alarm is an example of an unusual operating condition that should be reported as a potential release
- For release investigation and confirmation, test the secondary containment of tanks and piping
- Closure is an option if a system test confirms a leak.

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Ball Float Valves

- New rules eliminate the use of flow restrictors in vent lines as an overfill protection option for new UST systems and when overfill equipment is replaced.

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Ball Float Valves

Existing ball float valves must be tested for proper operation once every three years. (If it can not be tested it must be replaced with another method)

Implementation: Immediately after KDHE adopts rules

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Internally Lined Tanks

- Revises the internal lining requirement to mandate permanent closure of tanks using internal lining as the sole method of corrosion protection if the internal lining fails the periodic inspection (5 yrs) and cannot be repaired according to a code of practice.

Implementation: Immediately after KDHE adopts rules

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Repairs

- Revises definition to remove the link that a repair must be associated with a release
- Adds a requirement for owners and operators to test within 30 days after a repair to spill or overfill equipment and secondary containment areas.

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Repairs

- Records for each repair must be kept until the UST is permanently closed or undergoes a change in service.

Implementation: Immediately after KDHE adopts rules

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Groundwater and Vapor Monitoring

O/O must demonstrate proper installation and performance through site assessments.

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Notification

O/O notify the department at least 30 days prior to switching to a regulated substance containing:

- > 10 percent ethanol
- > 20 percent biodiesel

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Notification

Must demonstrate compatibility by:

Certification by a nationally recognized,
independent testing laboratory

or

Manufacturer approval

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Standby USTs for emergency power generators must use release detection:

Implementation:

Existing USTs - Within three years after KDHE adopts rule.

New USTs - Immediately upon adoption by KDHE

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Summary

Know how your UST system works.

Monitor UST facility daily and keep records

Make sure equipment used for overfill and leak detection works

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Summary

Keep KDHE informed of changes at your
UST facility

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